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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all similarly  
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARK C. MAO IN  
 SUPPORT OF PLAINTIFFS'  
 OBJECTIONS TO THE SPECIAL  
 MASTER'S RECOMMENDED  
 PRESERVATION PLAN**

Referral: The Honorable Susan van Keulen

**DECLARATION OF MARK C. MAO**

I, Mark C. Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' Objections to the Special Master's Recommended Preservation Plan.

3. Attached hereto as **Exhibit 1** are excerpts from the March 18, 2022 deposition of Google employee and designated Rule 30(b)(6) witness Dr. Glenn Berntson.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 15th day of April, 2022, at San Francisco, California.

/s/ Mark Mao